

3.

Plaintiff admits the allegations contained in Paragraph 3 of Defendant's Statement of Material Facts.

4.

Plaintiff admits the allegations contained in Paragraph 4 of Defendant's Statement of Material Facts.

5.

Plaintiff admits the allegations contained in Paragraph 5 of Defendant's Statement of Material Facts.

6.

Plaintiff admits the allegations contained in Paragraph 6 of Defendant's Statement of Material Facts.

7.

Plaintiff admits the allegations contained in Paragraph 7 of Defendant's Statement of Material Facts.

8.

Plaintiff admits the allegations contained in Paragraph 8 of Defendant's Statement of Material Facts.

9.

Plaintiff denies the allegations contained in Paragraph 9 of Defendant's Statement of Material Facts. Ms. Quinn and Jr.'s father met with Dr. Doolittle and Ms. Owens. Then, Jr. was called into the meeting after the four adults initially spoke. Janelle Quinn Affidavit, P. 17

10.

Plaintiff is unable to confirm or deny whether Dr. Doolittle reported the incident to his supervisor, Dr. Williams but admits that Dr. Doolittle testified to the same.

11.

Plaintiff admits the allegations contained in Paragraph 11 of Defendant's Statement of Material Facts.

12.

Plaintiff denies the allegations contained in Paragraph 12 of Defendant's Statement of Material Facts. Doc. 30-4, Deposition Transcript of Janelle Quinn, pg. 10, lines 1-6

13.

Plaintiff admits the allegations contained in Paragraph 13 of Defendant's Statement of Material Facts.

14.

Plaintiff admits the allegations contained in Paragraph 14 of Defendant's Statement of Material Facts.

15.

Plaintiff admits that she reported the incident to the Professional Standards of Commission, Columbia County Sheriff's Office, and the U.S. Department of Justice. Plaintiff denies filing a report with the U.S. Office of Civil Rights. Deposition Transcript of Janelle Quinn, pg. 43, lines 22-25; pg. 44, lines 1-4

16.

Plaintiff admits the allegations contained in Paragraph 16 of Defendant's Statement of Material Facts.

17.

Plaintiff admits the allegations contained in Paragraph 17 of Defendant's Statement of Material Facts.

18.

Plaintiff admits the allegations contained in Paragraph 18 of Defendant's Statement of Material Facts.

19.

Plaintiff denies the allegations contained in Paragraph 19 of Defendant's Statement of Material Facts. Doc. 30-4, pg. 82, lines 2-8.

20.

Plaintiff admits the allegations contained in Paragraph 20 of Defendant's Statement of Material Facts.

21.

Plaintiff admits the allegations contained in Paragraph 21 of Defendant's Statement of Material Facts.

22.

Plaintiff admits the allegations contained in Paragraph 22 of Defendant's Statement of Material Facts.

23.

Plaintiff admits the allegations contained in Paragraph 23 of Defendant's Statement of Material Facts.

24.

Plaintiff admits the allegations contained in Paragraph 24 of Defendant's Statement of Material Facts.

25.

Plaintiff denies the allegations contained in Paragraph 25 of Defendant's Statement of Material Facts. Ms. Quinn admits that she wanted Ms. Quinn to be terminated, but she also requested interventions to eliminate contact with Jr. and less drastic measures like transferring Ms. Owens and DEI Training. Doc. 30-4, Deposition Transcript of Janelle Quinn, pg. 10, lines 1-6. Janelle Quinn Affidavit, P. 6, 7, 8

26.

Plaintiff admits the allegations contained in Paragraph 26 of Defendant's Statement of Material Facts.

27.

Plaintiff denies the allegations contained in Paragraph 27 of Defendant's Statement of Material Facts. Doc. 30-5, pg. 27, lines 10-15. Doc. 30-6, pg. 19, lines 21-25; pg. 20, lines 1-6.

28.

Plaintiff denies the allegations contained in Paragraph 28 of Defendant's Statement of Material Facts. Doc. 30-5, pg. 27, lines 10-15. Doc. 30-6, pg. 19, lines 21-25; pg. 20, lines 1-6.

29.

Plaintiff denies the allegations contained in Paragraph 29 of Defendant's Statement of Material Facts. Doc. 30-5, pg. 26, lines 10-25.

30.

Plaintiff admits the allegations contained in Paragraph 30 of Defendant's Statement of Material Facts.

31.

Plaintiff admits the allegations contained in Paragraph 31 of Defendant's Statement of Material Facts.

32.

Plaintiff denies the allegations contained in Paragraph 32 of Defendant's Statement of Material Facts. On or about April 1, 2021, Plaintiff called Ms. Sherman and requested that Ms. Owens not have any further conversations with Jr. Ms. Sherman agreed to relay Plaintiff's request to Dr. Doolittle. Complaint, P. 32. Janelle Quinn Affidavit, P. 16

33.

Plaintiff is unable to confirm or deny whether Ms. Sherman spoke with Ms. Welch to describe the events and to ask how to calm the situation at the school but admits that Ms. Sherman testified to the same.

34.

Plaintiff denies the allegations contained in Paragraph 34 of Defendant's Statement of Material Facts. Exhibit 10 Email from Ms. Sherman to Ms. Welch, Magellan

35.

Plaintiff admits the allegations contained in Paragraph 35 of Defendant's Statement of Material Facts.

36.

Plaintiff admits that Ms. Welch testified in her deposition that MFLC Counselors are not allowed to be assigned to the same school their children attends. Plaintiff denies that she received notice of such a rule until after she reported racial discrimination to the Columbia County School District. Doc. 30-4, pg. 21-22, lines 1-25; 1-17.

37.

Plaintiff admits that Ms. Welch testified in her deposition that a conflict can exist where a counselor's objectivity could be perceived as compromised. Plaintiff denies that her objectivity was compromised when she advocated against racial discrimination for her minor son, Jr. Plaintiff denies that her objectivity was compromised due to working in the same school Jr. attended. Doc. 30-4, pg. 103, lines 1-8.

38.

Plaintiff admits the allegations contained in Paragraph 38 of Defendant's Statement of Material Facts.

39.

Plaintiff admits the allegations contained in Paragraph 39 of Defendant's Statement of Material Facts.

40.

Plaintiff admits the allegations contained in Paragraph 40 of Defendant's Statement of Material Facts.

41.

Plaintiff denies the allegations contained in Paragraph 41 of Defendant's Statement of Material Facts. Doc. 30-4, pg. 95, lines 4-15. Janelle Quinn Affidavit, P. 14, 15

42.

Plaintiff denies the allegations contained in Paragraph 42 of Defendant's Statement of Material Facts. Doc. 30-4, pg. 95, lines 4-15.

43.

Plaintiff denies the allegations contained in Paragraph 43 of Defendant's Statement of Material Facts. Doc. 30-4, pg. 111, lines 18-23; Doc. 30-7 pg. 13, lines 19-22.

44.

Plaintiff admits the allegations contained in Paragraph 44 of Defendant's Statement of Material Facts.

45.

Plaintiff is unable to confirm or deny whether Magellan had no indication the Defendant was trying to retaliate against or harm Plaintiff but admits that Ms. Welch testified to the same. Plaintiff denies that there was nothing improper in the way the matter was reported to Magellan. Exhibit 10 Email from Ms. Sherman to Ms. Welch, Magellan. Janelle Quinn Affidavit, P. 14

46.

Plaintiff admits the allegations contained in Paragraph 46 of Defendant's Statement of Material Facts.

47.

Plaintiff admits the allegations contained in Paragraph 47 of Defendant's Statement of Material Facts.

48.

Plaintiff admits the allegations contained in Paragraph 48 of Defendant's Statement of Material Facts.

49.

Plaintiff admits the allegations contained in Paragraph 49 of Defendant's Statement of Material Facts.

50.

Plaintiff denies the allegations contained in Paragraph 50 of Defendant's Statement of Material Facts. Doc 30-5, pg. 23, lines 21-25; pg. 24, lines 1-4

51.

Plaintiff admits the allegations contained in Paragraph 51 of Defendant's Statement of Material Facts.

52.

Plaintiff admits the allegations contained in Paragraph 52 of Defendant's Statement of Material Facts.

53.

Plaintiff denies the allegations contained in Paragraph 53 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 15, lines 1-9; pg. 18, lines 8-23.

54.

Plaintiff admits the allegations contained in Paragraph 54 of Defendant's Statement of Material Facts.

55.

Plaintiff denies the allegations contained in Paragraph 55 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 14, lines 20-22.

56.

Plaintiff denies the allegations contained in Paragraph 56 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 14, lines 20-22.

57.

Plaintiff denies the allegations contained in Paragraph 57 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 14, lines 20-22.

58.

Plaintiff denies the allegations contained in Paragraph 58 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 17, lines 13-17.

59.

Plaintiff denies the allegations contained in Paragraph 59 of Defendant's Statement of Material Facts. Doc. 30-7, pg. 14, lines 20-22.

60.

Plaintiff denies the allegations contained in Paragraph 60 of Defendant's Statement of Material Facts. Doc. 30-4, pg. 21, lines 1-25; pg. 22, lines 1-17.

61.

Plaintiff denies the allegations contained in Paragraph 61 of Defendant's Statement of Material Facts. Janelle Quinn Affidavit, P. 11, 14.

This 22nd day of May 2023.

/s/ Angelik Edmonds
Angelik Edmonds
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

JANELLE QUINN, individually
and on behalf of her minor child
D.J.Q. Jr.

Plaintiffs,

V.

COLUMBIA COUNTY
SCHOOL DISTRICT

Defendant.

[illegible]

)Civil Action No. 1:22-cv-00051-JRH-BKE

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

This is to certify that I electronically served Plaintiffs' Opposition to Defendant's Motion for Summary Judgment to the attorneys of record, William L. Fletcher, Jr. at willfletcher@fhflaw.com and Troy A. Lanier at tlanier@tlanierlaw.com.

DATE: This 22nd day of May, 2023

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

/s/Angelik Edmonds

Angelik Edmonds

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